

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework
and to Examine the Integration of Greenhouse
Gas Emissions Standards into Procurement
Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY
(U 902 E) AND SOUTHERN CALIFORNIA GAS COMPANY
(U 904 G) ON THE DRAFT WORKSHOP REPORT**

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September 15, 2006

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I.

INTRODUCTION

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission") and the Administrative Law Judge's Ruling Regarding Workshop Report and Motions to Intervene, issued August 22, 2006 (the "ALJ Ruling"), as modified by ALJ Econome on August 28, 2006, San Diego Gas & Electric ("SDG&E") and Southern California Gas Company ("SoCalGas") hereby submit these reply comments concerning the *Draft Workshop Report: Interim Emissions Performance Standard Program Framework, R.04-06-009* ("Draft Workshop Report") prepared by Commission Staff.

In accordance with the direction provided in the ALJ Ruling,^{1/} SDG&E and SoCalGas have refrained from repeating herein each of the arguments articulated in their

^{1/} ALJ Ruling, p. 2.

initial comments on the Draft Workshop Report, post-workshop comments and legal briefs. As SDG&E and SoCalGas noted in their initial comments on the Draft Workshop Report, these arguments cited by SDG&E and SoCalGas in their earlier filings provide support for the Staff Draft Proposal, with the limited modifications proposed by SDG&E and SoCalGas in their initial comments on the Draft Workshop Report. SDG&E and SoCalGas address herein only new issues raised by parties in their initial comments on the Draft Workshop Report, including whether recently-passed Assembly Bill (“AB”) 32 and Senate Bill (“SB”) 1368^{2/} necessitate an added workshop in Phase I of this proceeding, and what should be considered a new commitment for purposes of triggering the interim greenhouse gas (“GHG”) Emissions Performance Standard (“EPS”).

II.

PHASE I WORKSHOP TO CONSIDER THE IMPACT OF AB 32 AND SB 1368

Assuming that SB 1368 and AB 32 become law, a number of parties pointed out that modifications may be required in order to reconcile the revised Staff Straw Proposal included in Section C of the Draft Workshop Report with provisions contained in the legislation. Pacific Gas and Electric Company (“PG&E”) correctly points out that SB 1368 provides procedural direction, of which the Commission must take account.^{3/} Specifically, new Public Utilities Code § 8341(d)(1) would require the Commission to consult with the California Air Resources Board (“CARB”) and the California Energy Commission (“CEC”), while new Public Utilities Code § 8341(d)(6) would require the Commission to consult with the California Independent System Operator (“CAISO”) on

^{2/} Both AB 32 and SB 1368 have been adopted by the Legislature and it is anticipated that both bills will be signed by the Governor.

^{3/} Comments of Pacific Gas and Electric Company (“PG&E”) on Draft Workshop Report, p. 2.

reliability issues. The Commission should incorporate these consultation requirements into its procedural schedule in this proceeding. Such consultation is critical in order to minimize the potential for duplicative or inconsistent regulatory requirements and to ensure that the interim GHG EPS adopted in Phase I is the sole EPS applied to the utilities.

SDG&E and SoCalGas support the proposal by Southern California Edison Company (“SCE”) and others to hold a workshop to ensure that the Commission-adopted GHG EPS fully complies with SB 1368 and meets the consultation requirements of AB 32.^{4/} SDG&E and SoCalGas emphasize, however, that there is value in such a workshop only to the extent that it actually meet the consultation requirements set forth in AB 32. A workshop that merely solicits parties’ input on compliance with SB 1368 would not be an efficient use of time. The main concern of SDG&E and SoCalGas is that the required consultation with CARB, CEC, and the CAISO takes place in order to ensure that the interim GHG EPS adopted in Phase I is the sole EPS that will apply to LSEs in the Commission’s jurisdiction; SG&E and SoCalGas are less concerned with the form the consultation takes.

III.

PARTS REPLACEMENT AND POLLUTION CONTROL EQUIPMENT SHOULD NOT TRIGGER APPLICATION OF THE EPS

The California Cogeneration Council (“CCC”) raises the concern that “under the Draft Report, existing utility-owned resources will not have to comply with the interim EPS, because those resources will not be making ‘new commitments’ to the IOUs.”^{5/} In

^{4/} Comments of Southern California Edison Company (“SCE”) on Draft Workshop Report, p. 3.

^{5/} Comments of the California Cogeneration Council (“CCC”) on Draft Workshop Report, p. 4.

order to ensure the existence of a trigger that would prompt utility-owned resources to demonstrate compliance with the EPS, CCC therefore proposes that “each existing, baseload utility-owned unit larger than 25 MW should be required to show that it meets the interim EPS at least once every 10 years, or whenever the unit is repowered or major equipment is replaced or added,” and defines “added” so as include the installation of air pollution control equipment.^{6/} While SDG&E and SoCalGas agree that the EPS should be applied in a fair and non-discriminatory fashion to all resources, including both utility-owned and independent generators, it submits that the proposal of the CCC does not achieve this aim.

First, to be comparable the GHG emission associated with *all* contracts would require review every 10 years, not merely those for utility generation. However, neither the Draft Workshop Report nor the CCC proposal contemplate 10th year review of the GHG emissions associated with non-utility generation contracts that last longer than 10 years, including QF long-term contracts.^{7/} Thus, requiring that utility-owned generation demonstrate EPS compliance at least every 10 years, while non-utility-owned generators may avoid this requirement by entering into contracts with a duration of more than 10 years, is clearly discriminatory. Moreover, this requirement is not consistent with SB 1368, which would apply the EPS only when a new financial investment in baseload power is made by the LSE.⁸

^{6/} *Id.*

^{7/} The majority of SDG&E’s QF baseload power has been in place for more than 10 years, but the contracts do not expire until after 2019.

^{8/} *See*, Senate Bill (SB) 1368, Section 2, [Chapter 3] § 8341(a).

Second, replacement of equipment and/or the addition of pollution control equipment should not trigger application of the EPS. Even after replacement/addition of such equipment, the plant and its operation remain essentially unchanged. Since the EPS is an interim measure, it makes little sense to propose an overly-stringent, extreme definition of “new” that will merely increase litigation, delay the installation of pollution control equipment, reduce reliability as old parts are repaired rather than replaced, and potentially strand existing utility investments. Similar to PG&E, SDG&E and SoCalGas recommend that only changes that alter the nameplate capacity of the plant (*i.e.*, the plant's maximum rated output under specific conditions designated by the manufacturer and usually indicated on a nameplate physically attached to the generator) should trigger the EPS review.^{9/}

IV.

CONCLUSION

For the reasons set forth herein and in SDG&E and SoCalGas’ initial comments on the Draft Workshop Report, the Commission should schedule a workshop to ensure that the Commission-adopted GHG EPS fully complies with SB 1368 and that it meets the consultation requirements of AB 32. In addition, the Commission should reject the CCC proposal described above and should adopt an interim EPS based on the Revised Staff Proposal with the modifications proposed by SDG&E and SoCalGas.

^{9/} Comments of PG&E on Draft Workshop Report, p. 5.

Respectfully submitted this 15th day of September, 2006.

/s/ Aimee M. Smith_____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of **REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON THE DRAFT WORKSHOP REPORT** has been electronically mailed to each party of record on the service list in R.06-04-009. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the Commissioner Michael R. Peevey and Assigned Administrative Law Judges Jonathan Lakritz and Meg Gottstein.

Executed this 15th day of September, 2006 at San Diego, California.

/s/ Jodi Ostrander_____

Jodi Ostrander

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0604009 - CPUC - PG&E, SDG&E,
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